

# **Exhibit 3**

**AFFIDAVIT OF SGT. WILLIE MCCLELLAND**

Sgt. Willie McClelland, being duly sworn, deposes and states as follows:

1. My name is Willie McClelland. I am over 18 years of age and am competent to give this Declaration. I have personal knowledge of the facts stated herein.

2. I am a police sergeant for the DeKalb County, Georgia Police Department. I work out of the Tucker, Georgia precinct, which serves Decatur as well as Tucker, Clarkston, Stone Mountain, Doraville, Pine Lake and part of Atlanta. I have worked in law enforcement for more than 19 years.

3. Since approximately 2007, I have provided off-duty officer services at United Inn & Suites ("United Inn") in Decatur, Georgia. My colleague Detective Royal Weber also provides off-duty officer services at United Inn. I do not provide these services at any other hotel.

4. United Inn has approximately 175 rooms and typically stays at or near capacity. The hotel has daily, weekly and monthly guests.

5. Between Detective Weber and me, one of us is on-site at United Inn every night from 10 pm to 2 am. These hours may change slightly on any given evening depending on the amount of foot traffic in and around the hotel. At the end of my shift I will call or report in to the front desk. While Tahir Shareef made

the decision as to the specific hours for off-duty service, I believe that this four-hour time block is an appropriate window for an off-duty officer to be on-site, as it is nighttime and the time when there is most likely to be foot traffic on and around the property. The hotel has never cut our hours in an effort to save money. I also believe that having one off-duty officer on the property at a time is appropriate and sufficient, given the size of the property and the activity on the property.

6. My purpose in serving as an off-duty officer at United Inn is to serve as a deterrent to any potential criminal activity, and to be available to address immediately any incidents on-site that might require police intervention.

7. When I provide off-duty services at United Inn, I am in my DeKalb County Police uniform, including carrying my service weapon. When I am at the hotel, I am either sitting in a marked patrol car with blue cruising lights on, or walking the property, including checking in at the front desk personnel to see if they need any assistance from me. The front-desk staff will call my cell phone if they need help or want something suspicious to be checked out.

8. I have provided off-duty services at the United Inn for so long that I know all of the employees of the hotel and many of the long-term and repeat guests.

9. I make my decision as to where to position myself, and my patrol car, on the property based on where there appears to be the most activity on a particular night. So, if there is activity in the back of the hotel, I will move to the back. If there is activity in the front of the hotel, I move to the front.

10. United Inn has a network of security cameras to monitor the property. There are no areas on the hotel property that would provide concealment for commercial sex or other criminal activity outside, including in a car in the hotel parking lot. Hotel employees at the front desk monitor the security cameras, and those employees will contact the off-duty officer, or vice versa, if there is an unusual amount of activity in/around a particular room. The cameras were upgraded in 2022 and 2023.

11. While I am at United Inn I constantly observe and monitor individuals on the property. I will confront an individual who is violating the hotel's posted rules or the hotel's midnight curfew, or anyone who is loitering. I can verify with the front desk to confirm whether someone is on the guest registry, or who they might be visiting. Although I have not had it happen, if I were to see someone walking the property at United Inn who appeared to be soliciting sex, I would approach and question them as well. I would notice and question a female if they were coming in and out of a room, getting into cars, or walking around the

property loitering or soliciting. I also enforce DeKalb County's juvenile curfew on the property.

12. Because there is a large number of people who are long-term guests at the hotel, when there is activity of a criminal nature at the hotel, it is primarily of a domestic nature – fights between husband and wife or boyfriend and girlfriend, or children not wanting to go to school. As with any hotel, there are occasional incidents involving theft, property damage, burglary or drugs. In the case of United Inn, such activity is attributable to United Inn being in an area with homelessness and high foot traffic, off a main street, with easy in-and-out access to a main highway (I-285).

13. If there is someone who is causing any kind of disturbance at United Inn, I have been authorized by Mr. Shareef to ask that person to leave the property, to give them a trespass warning, or to tell the front desk not to renew the person's room rental. To my knowledge, no one who has been trespassed off the property has been provided a guest room thereafter.

14. In my experience, the management at United Inn has always cooperated with police officers and any other law enforcement agencies that show up at the property. When the police want someone removed from the property, the



hotel will not continue to rent a room to that person and will not allow them to remain on the property.

15. Between Detective Weber and myself, we have 35 years of police training and experience. I am trained to identify and recognize, as well as investigate, prevent and develop strategies for deterring all types of crimes. I am trained to recognize abuse situations, trafficking and prostitution and I have access to officers in the Special Victims Unit who specialize in trafficking to assist if any situation arises. I am always on the lookout for criminal activity at United Inn, including sex trafficking. In all the time I have provided off-duty services at United Inn, I have not ever observed any activity that caused me concern that there might be sex trafficking going on there. I have never observed any United Inn employee working with or otherwise interacting with anyone who I believed to be involved in commercial sex activity.

16. Because I spend so much time at the property, I have had the opportunity to evaluate the general security profile of the property. I have not provided Mr. Shareef or Mr. Islam with any recommendations for enhancements or upgrades for security at United Inn, nor are there any changes that I would recommend given the existing security posture at the property.

17. While some hotels hire private security guards to work on the property, in my experience all those guards will do if there is a problem is call the police. In contrast, when Detective Weber and I are providing off-duty services at United Inn, we *are* the police and we are already on site to deal with any problems.

Sworn to and subscribed before me  
this 7th day of June, 2023.

  
Notary Public



  
SGT. WILLIE MCCLELLAND #2486

My commission expires: March 13, 2025